

# Morgan Lewis

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April 29, 2022

**VIA ECF**

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 443  
New York, NY 10007

**Re: Giroto v. Chloe Boutique S.A., Inc. et al., 1:21-cv-10098-VEC-SLC**  
**Request for a 30 Day Order**

Dear Judge Caproni:

We represent defendants Chloe Boutique S.A., Inc. ("Chloe") and Soho Centrale, LLC ("SoHo Centrale", and, collectively with Chloe, "Defendants") in connection with the above-referenced action. We write with the consent of counsel for Plaintiff Luigi Giroto ("Plaintiff"), to inform the Court that the parties have reached an agreement in principle to resolve this matter. Accordingly, counsel for Defendants respectfully requests that the Court stay all deadlines in this case for a period of 30 days to permit the parties to finalize the terms of their agreement and submit a stipulation of dismissal to the Court. This is Defendants' first request to stay deadlines to finalize the terms of their agreement with Plaintiff.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

*/s/ Michael F. Fleming*

Michael F. Fleming

C: All Counsel of Record (via ECF)

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Application GRANTED. It is hereby ordered that all previously scheduled conferences and other deadlines are CANCELLED. It is further ordered that this case is DISMISSED with prejudice and without costs (including attorneys' fees) to either party. The Clerk of Court is respectfully directed to terminate all open motions and CLOSE the case.

Within **30 days** of this Order, the parties may apply to reopen this case. Any such application must show good cause for holding the case open in light of the parties' settlement and must be filed within **30 days**. Any request filed after 30 days or without a showing of good cause may be denied solely on that basis.

Additionally, if the parties wish for the Court to retain jurisdiction to enforce their settlement agreement, they must submit **within the same 30-day period**: (1) their settlement agreement to the Court in accordance with Rule 7.A of the Court's Individual Practices and (2) a request that the Court issue an order expressly retaining jurisdiction to enforce the settlement agreement. *See Hendrickson v. United States*, 791 F.3d 354 (2d Cir. 2015).

SO ORDERED.



Date: 5/2/2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE